

EXHIBIT B

INDEX TO ZHP PARTIES' MOTION TO REDACT AND SEAL A PORTION OF PLAINTIFFS' BRIEF IN OPPOSITION TO THE ZHP PARTIES' MOTION FOR A PROTECTIVE ORDER PRECLUDING THE DEPOSITION OF BAOHUA CHEN AND ACCOMPANYING EXHIBIT KK

	Material To Be Sealed	Basis for Sealing	Clearly Defined and Serious Injury that Would Result if the Relief is Not Granted	Why a Less Restrictive Alternative to the Relief Sought Is Not Available	Party in Opposition to Sealing, If Any, And Basis
1.	Exhibit KK to Plaintiffs' Brief in Opposition to the ZHP Parties' Motion for a Protective Order Precluding the Deposition of Baohua Chen (ECF No. 1298)	<p>The ZHP Parties request that this exhibit be sealed because it describes in detail internal ZHP emails designated "RESTRICTED CONFIDENTIAL." <i>See</i> Du Decl. ¶¶ 1, 3.</p> <p>These emails describe the results of an internal audit of ZHP's finished dose manufacturing facility conducted by the Vice President of Quality Assurance for Princeton in January 2010, as well as steps taken by the ZHP Parties in response. <i>See id.</i> at ¶ 4.</p> <p>The Protective Order entered by the Honorable Judge Kugler on June 26, 2019 (ECF No. 139) specifically allows for confidential treatment of the information contained in the report, and this report was designated "RESTRICTED CONFIDENTIAL" to protect against disclosure. <i>See</i> Proposed FOF/COL Decl. at ¶¶ 4, 10.</p>	<p>The ZHP Parties' internal audit information is commercially sensitive, non-public business information.</p> <p>If disclosed, it would reveal to the ZHP Parties' direct competitors the internal standards ZHP Parties developed to ensure that ZHP's manufacturing facilities were maintained in compliance with the FDA's current GMP standards, as well as any identified shortcomings. <i>See</i> Du Decl. ¶ 5. This would allow the ZHP Parties' direct competitors to capitalize upon and exploit any perceived shortcomings to the ZHP Parties' material disadvantage. <i>See id.</i> at ¶ 11.</p> <p>Comprehensive audits are necessary for the ZHP Parties to ensure compliance with regulatory requirements, improve their manufacturing practices and processes, and address any shortcomings. <i>See id.</i> at ¶ 9. But public disclosure will result in participants being less forthcoming, or auditors being less direct in their conclusions for fear of embarrassment or misunderstanding, depriving the ZHP Parties of the ability to conduct candid audits of their manufacturing facilities. <i>See id.</i> at ¶ 10.</p>	<p>The ZHP Parties request that this exhibit be sealed because it contains confidential and proprietary information regarding the ZHP Parties' internal audits. <i>See</i> Du Decl. ¶¶ 4, 11.</p> <p>There is no less restrictive alternative available or practicable because the ZHP Parties have reviewed and analyzed this exhibit in order to specifically identify exactly what information should remain sealed, and seek to seal only the portions of this Exhibit that documents that disclose the contents of the emails designated as "RESTRICTED CONFIDENTIAL." <i>See</i> Proposed FOF/COL Decl. at ¶ 21.</p>	<p>Plaintiffs have objected to sealing this exhibit because they do not believe that confidential treatment is justified under the Protective Order in light of what they describe as a public health interest. <i>See</i> Proposed FOF/COL Decl. at ¶ 23.</p>

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2.	Plaintiffs' Brief in Opposition to the ZHP Parties' Motion for a Protective Order Precluding the Deposition of Baohua Chen (ECF No. 1298) at Page 22 (first full paragraph)	<p>The ZHP Parties request that this portion of Plaintiffs' Opposition Brief be sealed because it references portions of Exhibit KK, which describes in detail internal ZHP emails designated "RESTRICTED CONFIDENTIAL." <i>See</i> Du Decl. ¶¶ 1, 3.</p> <p>These emails describe the results of an internal audit of ZHP's finished dose manufacturing facility conducted by the Vice President of Quality Assurance for Princeton in January 2010, as well as steps taken by the ZHP Parties in response. <i>See id.</i> at ¶ 4.</p> <p>The Protective Order entered by the Honorable Judge Kugler on June 26, 2019 (ECF No. 139) specifically allows for confidential treatment of the information contained in the report, and this report was designated "RESTRICTED CONFIDENTIAL" to protect against disclosure. <i>See</i> Proposed FOF/COL Decl. at ¶¶ 4, 10.</p>	<p>The ZHP Parties' internal audit information is commercially sensitive, non-public business information.</p> <p>If disclosed, it would reveal to the ZHP Parties' direct competitors the internal standards ZHP Parties developed to ensure that ZHP's manufacturing facilities were maintained in compliance with the FDA's current GMP standards, as well as any identified shortcomings. <i>See</i> Du Decl. ¶ 5. This would allow the ZHP Parties' direct competitors to capitalize upon and exploit any perceived shortcomings to the ZHP Parties' material disadvantage. <i>See id.</i> at ¶ 11.</p> <p>Comprehensive audits are necessary for the ZHP Parties to ensure compliance with regulatory requirements, improve their manufacturing practices and processes, and address any shortcomings. <i>See id.</i> at ¶ 9. But public disclosure will result in participants being less forthcoming, or auditors being less direct in their conclusions for fear of embarrassment or misunderstanding, depriving the ZHP Parties of the ability to conduct candid audits of their manufacturing facilities. <i>See id.</i> at ¶ 10.</p>	<p>The ZHP Parties request that this exhibit be sealed because it contains confidential and proprietary information regarding the ZHP Parties' internal audits. <i>See</i> Du Decl. ¶¶ 4, 11.</p> <p>There is no less restrictive alternative available or practicable because the ZHP Parties have reviewed and analyzed this exhibit in order to specifically identify exactly what information should remain sealed, and seek to seal only the portions of this Exhibit that documents that disclose the contents of the emails designated as "RESTRICTED CONFIDENTIAL." <i>See</i> Proposed FOF/COL Decl. at ¶ 21.</p>	<p>Plaintiffs have objected to sealing this report because they do not believe that confidential treatment is justified under the Protective Order in light of what they describe as a public health interest. <i>See</i> Proposed FOF/COL Decl. at ¶ 23.</p>